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18 *Attorneys for Defendant Barrick Goldstrike Mines, Inc.*

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 ELIZABETH SWEENEY, as surviving spouse,
22 actual owner of the claims set forth herein, and/or as
23 authorized personal representative of the estate of
24 MICHAEL CHRISTOPHER SWEENEY, deceased,

25 Plaintiff,

26 vs.

27 BARRICK GOLDSTRIKE MINES INC., a Foreign
28 Corporation,

Defendant.

Case No.: 3:20-cv-644

**STIPULATION AND ORDER TO
EXTEND DEFENDANT BARRICK
GOLDSTRIKE MINES INC.'S
DEADLINE TO RESPOND TO
COMPLAINT**

[FIRST REQUEST]

29 Defendant, BARRICK GOLDSTRIKE MINES, INC. ("Barrick"), by and through its
30 counsel, Manning Curtis Bradshaw and Bednar, PLLC and Armstrong Teasdale LLP, and Plaintiff
31 ELIZABETH SWEENEY, ("Sweeney"), by and through her counsel, Kemp & Kemp, Attorneys at
32 Law, hereby agree and stipulate to extend the deadline for Barrick to answer or otherwise respond to
33 the Complaint from February 5, 2021, 2021, to March 4, 2021. This is the first request to extend this
34 particular deadline.

1 Sweeney served the Summons and Complaint against Barrick on January 15, 2021, asserting
2 claims for disability discrimination under the ADA and NRS 613.330.

3 Good cause exists to extend the deadline for Barrick to respond to the Complaint to March 4,
4 2021. Lead counsel for Barrick was required to quarantine until January 26, 2021, after his family
5 members contracted COVID earlier in the month. As a result, counsel for Barrick needs additional
6 time to gather information to answer or otherwise respond to the Complaint. Sweeney has agreed to
7 this extension of the response deadline. The parties believe the extension will not unduly delay
8 proceedings as this case is still in its infancy and no scheduling order is currently in place. This
9 stipulation is entered into in good faith and is not filed for improper purposes.

10 Accordingly, the parties request that this Court extend Barrick's deadline to answer or
11 otherwise respond to the Complaint to March 4, 2021.

12 DATED this 28th day of January, 2021.

DATED this 28th day of January, 2021.

13 **KEMP & KEMP**

**MANNING CURTIS BRADSHAW &
BEDNAR PLLC**

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18 *Attorneys for Defendant Barrick Goldstrike
Mines, Inc.*

1 **ORDER**
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3 **IT IS SO ORDERED.**
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5 *William G. Cobb*
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8 UNITED STATES MAGISTRATE JUDGE
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10 DATED: January 28, 2021
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